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Attorneys for Defendants, Counterclaim-Plaintiffs,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRUSTEES OF THE NEVADA RESORT)
ASSOCIATION—INTERNATIONAL)
ALLIANCE OF THEATRICAL STAGE)
EMPLOYEES AND MOVING PICTURE)
MACHINE OPERATORS OF THE UNITED)
STATES AND CANADA, LOCAL 720,)
PENSION TRUST; TRUSTEES OF THE)
NEVADA RESORT ASSOCIATION—)
INTERNATIONAL ALLIANCE OF)
THEATRICAL STAGE EMPLOYEES AND)
MOVING PICTURE MACHINE)
OPERATORS OF THE UNITED STATES)
AND CANADA, LOCAL 720, WAGE)
DISABILITY TRUST; and TRUSTEES OF)
THE NEVADA RESORT ASSOCIATION—)
INTERNATIONAL ALLIANCE OF)
THEATRICAL STAGE EMPLOYEES AND)
MOVING PICTURE MACHINE)
OPERATORS OF THE UNITED STATES)
AND CANADA, LOCAL 720, APPRENTICE)
AND JOURNEYMAN TRAINING AND)
EDUCATION TRUST,)

Plaintiffs,)

vs.)

BIG FIN 720, LLC, a Domestic Limited-Liability)
Company; BIG FIN VEGAS, LLC, a Domestic)

Case No. 2:23-cv-00149-RFB-DJA

**STIPULATION AND REQUEST TO
EXTEND TIME TO FILE
RESPONSE TO MOTION TO
DISMISS AND TO EXTEND TIME
TO REPLY TO THE SAME**

(First Request)

Limited-Liability Company; BIG FIN
PRODUCTIONS, LLC, a Domestic Limited-
Liability Company; and BIG FIN
INTERNATIONAL, LLC, a Domestic Limited-
Liability Company,

Defendants.

BIG FIN 720, LLC, a Domestic Limited-Liability
Company; BIG FIN VEGAS, LLC, a Domestic
Limited-Liability Company; BIG FIN
PRODUCTIONS, LLC, a Domestic Limited-
Liability Company; and BIG FIN
INTERNATIONAL, LLC, a Domestic Limited-
Liability Company,

Counterclaim-Plaintiffs,

vs.

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; TRUSTEES OF THE
NEVADA RESORT ASSOCIATION—
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720, WAGE
DISABILITY TRUST; and TRUSTEES OF
THE NEVADA RESORT ASSOCIATION—
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720, APPRENTICE
AND JOURNEYMAN TRAINING AND
EDUCATION TRUST,

Counterclaim-Defendants.)

BIG FIN 720, LLC, a Domestic Limited-Liability)
 Company; BIG FIN VEGAS, LLC, a Domestic)
 Limited-Liability Company; BIG FIN)
 PRODUCTIONS, LLC, a Domestic Limited-)
 Liability Company; and BIG FIN)
 INTERNATIONAL, LLC, a Domestic Limited-)
 Liability Company,)

Third-Party Plaintiffs,)

vs.)

INTERNATIONAL ALLIANCE OF)
 THEATRICAL STAGE EMPLOYEES AND)
 MOVING PICTURE MACHINE)
 OPERATORS OF THE UNITED STATES)
 AND CANADA, LOCAL 720, a Labor)
 Organization; MARIELLE “APPLE” THORNE,)
 an Individual; PHIL JAYNES, an Individual; and)
 RONALD POVEROMO, an Individual,)

Third-Party Defendants.)

Pursuant to LR 6-1, Third-Party Plaintiffs, BIG FIN 720, LLC; BIG FIN VEGAS, LLC; BIG FIN PRODUCTIONS, LLC; AND BIG FIN INTERNATIONAL, LLC (“Third-Party Plaintiffs”) and Third-Party Defendants INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720 (“Union”), MARIELLE “APPLE” THORNE, and PHIL JAYNES (collectively “Third-Party Defendants”) by and through their respective counsel of record, stipulate and request that the Court extend the deadline for Third-Party Plaintiffs to respond to the Third-Party Defendants’ Motion to Dismiss (“Motion”) from the current deadline of June 9, 2023 up to and including June 22, 2023, as well as extend the Third Party Defendants’ deadline to file its Reply from June 30, 2023 up to and including July 13, 2023.

In support of this Stipulation and Request, the parties state the following:

1. Third-Party Defendants filed their Motion on May 26, 2023. Accordingly, Third-Party Plaintiffs’ response to the Motion is currently due by June 9, 2023.

1 2. On June 6, 2023, and June 7, 2023, Third-Party Plaintiffs requested an extension of
2 time to respond to the Motion and proposed an equal extension of time for Third-Party Defendants
3 to file their Reply. The parties agreed to an extension on June 8, 2023. Accordingly, if approved by
4 the Court, the new deadline for Third-Party Plaintiffs to respond to the Motion would be June 22,
5 2023 and Third-Party Defendants Reply would then be due twenty-one (21) days later on July 13,
6 2023.

7 3. This request is brought in good faith and not sought for the purpose of delay or any
8 other improper purpose. Rather, this request is sought to provide Third-Party Plaintiffs' counsel
9 sufficient time to review and respond to the issues raised in the Motion in light of the Memorial Day
10 holiday, presently demanding workload, other looming deadlines, and personal commitments. It also
11 allows Third-Party Defendants' counsel to navigate pre-existing travel plans in June, including of the
12 client, and the July 4 holiday.

13 4. This is the first request to extend the deadline to respond to the Motion and to reply
14 to Third-Party Plaintiff's response. No previous extensions of time have been granted.

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WHEREFORE, the parties respectfully request that the Court extend the deadline for Third-Party Plaintiffs to respond to the Motion from the current deadline of June 9, 2023, up to and including June 22, 2023, and correspondingly extend the Third-Party Defendants' deadline to reply through July 13, 2023.

WEINBERG, ROGER & ROSENFELD

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Attorneys for Third-Party Defendants
IATSE Local 720, Marielle "Apple"
Thorne and Phil Jaynes

Attorneys for Third-Party Plaintiffs

ORDER

IT IS SO ORDERED.

DATE: June 9, 2023


UNITED STATES DISTRICT JUDGE